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ABSTRACT

By request of the Senate Committee on Appropriations, the General Accounting Office (GAO) verified the number of full-time equivalent Indian students reported as attending 12 tribally controlled community colleges during the 1980-1981 academic year and obtained college officials' opinions on the benefits of the Tribally Controlled Community College Assistance Act (1978) and their concerns about the Bureau of Indian Affairs' (BIA) implementation of the act. The GAO review was limited to 11 colleges funded in 1980 plus the Navajo Community College. GAO found discrepancies in the full-time equivalent Indian student counts reported by 10 of the 11 colleges. GAO noted that the colleges had not required adequate evidence that all students were eligible Indians, had not maintained up-to-date enrollment data, or had made counting errors. While college officials were unanimous in their support of the act's concept, they raised issues concerning its implementation and funding. Their concerns involved reduction in funds, failure to count Indian students not members of federally recognized tribes, BIA delays in certifying that students are Indians, the formula used for computing full-time equivalent Indian students, the cutoff date for computation, lack of funds for needed college activities, and funding of the Navajo Community College. (CM)

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ED205353

REPORT BY THE U.S.

General Accounting Office

Qualifying For Federal Funding Of Tribally Controlled Community Colleges

For tribally controlled community colleges to qualify for Federal assistance, the Bureau of Indian Affairs must verify the number of full-time equivalent Indian students claimed by the colleges. GAO found discrepancies in student counts in 10 of 11 of the community colleges it reviewed for academic year 1980-81. The colleges were not requiring proof that all suudents were eligible Indians, were not maintaining up-to-date enrollment data, and were making counting errors.

Although college officials strongly favor the Tribally Controlled Community College Assistance Act of 1978 and want it reauthorized, they expressed concern about the way the Bureau of Indian Affairs implements the act. Bureau officials are now taking steps to resolve these concerns.

GAP made this review at the request of the Subcommittee on the Department of the Interior and Related Agencies, Senate Committee on Appropriations.

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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

B-203465

The Honorable James A. McClure
Chairman, Subcommittee on the Department
of the Interior and Related Agencies
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

In accordance with Senate Report 96-985 and agreements reached with your office, this report discusses our verification of the student counts for the 12 tribally controlled community colleges funded under the Tribally Controlled Community College Assistance Act during the 1980-81 academic year. The report also contains the opinions of college officials on the act and its implementation. College officials said they were in favor of the act and wanted it reauthorized but were concerned about some implementation problems. Their concerns are discussed in this report.

As requested by your office, agency comments were not obtained. However, we discussed our findings with agency officials and considered their comments in the report. Copies of the report are being sent to the Director, Office of Management and Budget, and the Secretary of the Interior. We will also send copies to other interested parties and make copies available to others upon request.

Sincerely yours,

Henry Eschwege

Henry Eschwege
Director

GENERAL ACCOUNTING OFFICE
REPORT TO THE CHAIRMAN
SUBCOMMITTEE ON THE DEPARTMENT OF
THE INTERIOR AND RELATED AGENCIES
COMMITTEE ON APPROPRIATIONS
UNITED STATES SENATE

QUALIFYING FOR FEDERAL FUNDING OF TRIBALLY CONTROLLED COMMUNITY COLLEGES

D I G E S T

The Tribally Controlled Community College Assistance Act of 1978 authorizes the Bureau of Indian Affairs (BIA), Department of the Interior, to award grants to tribally controlled community colleges for operation and maintenance of their schools. Title I of the act authorizes awards of up to $4,000 to be made for each full-time equivalent Indian student. 1/

Title II of the act authorizes grants to the Navajo Community College for construction, operation, and maintenance of its school on the basis of need rather than the number of Indian students enrolled. During fiscal year 1980, BIA awarded grants totaling $4 million to 11 community colleges. Another $6.4 million was awarded to the Navajo Community College. (See p. 10.)

The Senate Committee on Appropriations requested GAO to

--verify the number of full-time equivalent Indian students reported as attending 12 tribally controlled community colleges during the 1980-81 academic year and

--obtain college officials' opinions on the benefits of the act and concerns about BIA's implementation of the act. (See pp. 3 and 4.)

VERIFICATION OF INDIAN STUDENT COUNTS

Discrepancies were found in the full-time equivalent Indian student counts reported by 10 of the

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1/A student who takes 12 credit-hours is considered a full-time student. A full-time equivalent student is calculated by adding the total number of credit hours for all part-time students and dividing by 12.

11 colleges receiving funds under Title I. GAO's verification of the student counts showed that the colleges were not requiring evidence that all students were eligible Indians, were not maintaining up-to-date enrollment data, and were making counting errors. GAO reconciled the differences with college officials and obtained their assurances that accurate counts would be made in the future on the number of full-time equivalent Indian students enrolled in their colleges. (See p. 5.)

The Navajo Community College estimated that 977 full-time equivalent Indian students were enrolled in its school during the fall of 1980. GAO counted 941 equivalent Indian students, assuming that all students the college listed as Indians were Indians. The college does not keep records of Indian eligibility for all of its students primarily because it is not funded on the basis of full-time equivalent Indian students. (See p. 8.)

OPINIONS ON BENEFITS OF THE ACT

College officials said they wanted the act reauthorized because many Indians would not receive a college education if funds were not made available under the act. During fiscal year 1980, funds received under the act accounted for 43 percent of their school year budgets. Two school presidents said that the act gave them an incentive to sever ties with larger colleges and become accredited as independent schools. (See p. 9.)

CONCERNS ABOUT BIA's IMPLEMENTATION OF THE ACT

Concerns raised by one or more college officials included:

--Contrary to its own regulations, BIA approved grants in February 1981 for two additional colleges which resulted in reductions to the amount of funds the 11 colleges had expected to receive from $3,490 to about $3,000 for each full-time equivalent Indian student. BIA said that new schools which qualify for funding will not receive a grant until the subsequent school year. (See p. 11.)

--Not being able to count Indian students who are not members of a federally recognized tribe. BIA is drafting proposed amendments to the act to allow these Indian students to be counted. (See p. 11.)

--BIA delays in certifying that students are Indians and should be counted in determining the number of full-time equivalent Indian students. As a result, some colleges were unable to claim some eligible students for funding. BIA's Office of Indian Education Programs is trying to resolve this problem with the commissioner who has control over the BIA area offices which handle requests for eligibility determinations. (See p. 11.)

--The formula for computing full-time equivalent Indian students does not allow inclusion of all courses, such as summer classes, and does not allow for more than 12 credit-hours per student. BIA is drafting amendments to the act to include these courses and credits in the full-time equivalent student computations. (See p. 11.)

--The 6-week cutoff date after the start of a school term in computing full-time equivalent Indian students is too long and does not allow for adequate compensation to colleges for their scheduling, planning, and administrative costs incurred for those students who withdraw. BIA is drafting changes to the act to allow a 3-week cutoff date for schools on the quarter system. The 6-week cutoff date would be continued for schools on the semester system. (See p. 12.)

--Not being able to receive funds for other college activities such as continuing education, adult education, workshops, tribal development activities, and construction and renovation of facilities. BIA opposed expanding the use of assistance funds for these purposes. (See p. 12.)

--The Navajo Community College being funded on the basis of need rather than a formula. (See p. 13.)

GAO believes that BIA is appropriately addressing the concerns raised by the college officials.

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ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office
OIEP	Office of Indian Education Programs

CHAPTER 1

INTRODUCTION

The Tribally Controlled Community College Assistance Act of 1978 (Public Law 95-471) was enacted to provide for the operation and maintenance of tribally controlled community colleges and to ensure continued and expanded educational opportunities for Indian students. Title I provides operational grants and technical assistance for eligible colleges and mandates feasibility studies as a prerequisite to grant awards. Title II of the act amends the Navajo Community College Act of 1971 (25 U.S.C. 640a et seq.) to provide grants to that institution for construction, operation, and maintenance.

TITLE I--TRIBALLY CONTROLLED COMMUNITY COLLEGES EXCEPT NAVAJO

Title I requires the Bureau of Indian Affairs (BIA), Department of the Interior, to conduct a feasibility study to determine whether there is justification to encourage and maintain a community college. A positive study entitles the community college to apply for financial assistance. BIA awarded a contract for the feasibility studies to the American Indian Higher Education Consortium, whose members are 17 tribally controlled community colleges. The actual studies were conducted by professional educators, usually associated with the tribally controlled community colleges, and were approved by BIA. As of April 1981, 13 colleges had received positive feasibility studies and were receiving funds.

The Secretary of the Interior is authorized to provide grants to eligible colleges in amounts up to $4,000 for each full-time equivalent Indian student in attendance during the academic year. Grant amounts are determined by adding the full-time equivalent enrollments for each academic term and dividing the total by the number of terms in the academic year, then multiplying the total by $4,000. For example, in a school operating on a two-semester basis, the grant calculation would be:

$$\frac{\text{Fall semester count + spring semester count}}{2} \times \$4{,}000$$

No grant can exceed the annual operating expenses of the college's educational program. Also, if the maximum $4,000 funding per student is not available, the colleges receive a prorated share of the available funds.

The act authorized funding for 3 fiscal years beginning October 1, 1979. The Congress appropriated $4 million and $4.8 million, respectively, for operating grants during fiscal years 1980 and 1981. During fiscal year 1980 BIA funded 11 schools at a prorated share of approximately $3,100 per student.

The number of funded schools increased to 13 during fiscal year 1981, with an estimated prorated share of about $3,000 per student.

TITLE II--NAVAJO COMMUNITY COLLEGE

Title II provides funding for the Navajo Community College. The act states that this college is treated separately because the Navajo Tribe (1) is the largest American Indian tribe in the United States, (2) has a community college on its reservation, and (3) needs to expand its college. In addition, the college's needs had already been recognized by the Congress through passage of the Navajo Community College Act in 1971. The Navajo Community College was not required to have a feasibility study as were the other tribally controlled community colleges.

Initially, the Navajo Community College was to be funded at $4,000 per full-time equivalent student, but Title II was amended by part F of the Higher Education Amendments of 1981 (Public Law 96-374) on October 3, 1980. This amendment authorized BIA to fund the college according to its operation and maintenance "needs" rather than on the formula basis used in Title I. In fiscal year 1980 the college received $6.4 million--or about $8,000 per full-time equivalent student. The fiscal year 1981 funding has not been finalized, but the college had received over $3.1 million as of April 6, 1981. In a March 1980 report, 1/ we recommended that the Secretary of the Interior review the college's operations and determine the most equitable funding method. BIA did not start this study until after we raised the issue during our current review. BIA is currently trying to determine the college's total fiscal year 1981 needs.

WHAT ARE FULL-TIME EQUIVALENT INDIAN STUDENTS?

To receive assistance under Title I, tribally controlled community colleges must calculate the number of full-time equivalent Indian students enrolled for each academic term, except summer. This number is calculated by adding the total number of credit-hours for all part-time Indian students, divided by 12, to the number of full-time Indian students. The student count is based on registrations in effect at the end of the sixth week of each academic term. This count must reflect any changes in registration that take place during the first six weeks of classes in each term. These changes include additional registrations, withdrawals from the college, and any classes that students add or drop during the first 6 weeks.

1/"Navajo Community College Funding Problems" (CED-80-79, Mar. 21, 1980).

The act and subsequent regulations and guidelines issued by the Department of the Interior further define certain aspects of the full-time equivalent calculations. These are:

--An Indian is defined as a person who is a member of an Indian tribe and is eligible to receive services from the Secretary of the Interior. The schools must have evidence of the students' Indian eligibility.

--A part-time student is a student registered for less than 12 credit-hours.

--A full-time student is a student registered for 12 or more credit-hours.

--High school students or individuals working on general educational development certificates are not eligible to be counted in the full-time equivalent calculation.

--Students must be enrolled for credit.

--Classes must be held during a normal academic term.

--For classes where a variable number of credits can be awarded, only those actually awarded may be counted.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Senate Committee on Appropriations in Senate Report 96-985 asked us to verify the community colleges' student counts. As agreed with the committee, we limited our review to the 11 colleges funded in 1980 plus the Navajo Community College, although this college is no longer funded under a "student count" concept. Because of committee deadlines, we were limited to verifying only those student count reports that were available for academic year 1980-81. In addition, we agreed to obtain college officials' comments on the act and its implementation.

We visited the following colleges:

--Blackfeet Community College, Browning, Montana.

--College of Ganado, Ganado, Arizona.

--D-Q University, Davis, California.

--Dull Knife Memorial College, Lame Deer, Montana.

--Little Hoop Community College, Fort Totten, North Dakota.

--Navajo Community College, Tsaile, Arizona.

--Nebraska Indian Community College, Winnebago, Nebraska.

--Oglala Sioux Community College, Kyle, South Dakota.

--Salish-Kootenai Community College, Pablo, Montana.

--Sinte Gleska Community College, Rosebud, South Dakota.

--Standing Rock Community College, Fort Yates, North Dakota.

--Turtle Mountain Community College, Belcourt, North Dakota.

To verify student counts we interviewed college officials and reviewed official enrollment records, student files, class rosters, course schedules, college catalogs, and other pertinent records. We traced the students' names and credit-hour data to supporting documents and verified actual enrollment counts at the 6-week cut-off date. We also reviewed tribal, BIA, and college records to determine students' Indian eligibility. We computed student counts in accordance with the act and BIA's regulations and guidelines. We compared the result of our count to the school's reports and reconciled the variances.

We interviewed BIA officials regarding sections of the act, implementing regulations dealing with the student count formula, and funding provisions and reviewed BIA's fiscal years 1980 and 1981 budget process.

To obtain opinions on the act and its implementation, we interviewed college officials, usually the school's president, vice president for academic affairs, members of the board of trustees, and/or the dean of instruction. Tribal officials were interviewed if they were available. A list of officials interviewed is included in the appendix.

At the committee's request, we did not obtain agency comments on this report. However, we discussed our findings with officials in BIA's Office of Indian Education Programs (OIEP) and incorporated their comments where appropriate.

CHAPTER 2

VERIFICATION OF INDIAN STUDENT COUNTS

We found discrepancies in the full-time equivalent Indian student counts reported by 10 of the 11 community colleges receiving funds under Title I of the Tribally Controlled Community College Assistance Act. In our verification of student counts, we noted that the colleges had not required adequate evidence that all students were eligible Indians, had not maintained up-to-date enrollment data, or had made counting errors. We reconciled the differences with college officials and obtained their assurances that the deficiencies in their procedures would be corrected for next year's student counts. BIA said it will use our computations in its annual adjustment process.

COMPARISON OF STUDENT COUNTS

Full-time Equivalent Indian Students
1980 Fall Semester or Quarter

College	College's computation	Our computation	Differences	Reasons for differences (note a)
Blackfeet	200	199	-1	(1)
D-Q	82	84	+2	(3)
Dull Knife	53	53	0	-
College of Ganado	82	80	-2	(1,3)
Little Hoop	33	24	-9	(2,3)
Nebraska Indian	129	120	-9	(1,2,3)
Oglala Sioux	214	226	+12	(3)
Salish-Kootenai	125	110	-15	(1,2,3)
Sinte Gleska	187	176	-11	(1)
Standing Rock	120	125	+5	(3)
Turtle Mountain	169	163	-6	(2,3)

a/Explanations for notes are discussed on pp. 7 and 8.

Full-time Equivalent Indian Students
1981 Spring Semester or Winter Quarter

College (note b)	College's computation	Our computation	Differences	Reasons for differences (note a)
Blackfeet	196	194	-2	(1)
Little Hoop	18	18	0	-
Oglala Sioux	343	337	-6	(1,3)
Salish-Kootenai	147	122	-25	(1,2,3)
Sinte Gleska	218	218	0	-
Standing Rock	160	158	-2	(1,2,3)
Turtle Mountain	159	155	-4	(1,2,3)

a/Explanations for notes are discussed on pp. 7 and 8.

b/Spring semester or winter quarter computations were not completed at D-Q, Dull Knife, College of Ganado, or Nebraska Indian Community College at the time of our visit.

REASONS FOR DIFFERENCES IN STUDENT COUNTS

The following notes explain the reasons for the differences between the colleges' computations and our computations. The notes are keyed to the preceding table.

Indian eligibility (note 1)

Some schools did not maintain up-to-date files on whether students were certified by BIA as being Indians. Therefore, in some cases schools counted students as Indians without supporting documentation. Only D-Q University and Nebraska Indian Community College required students at registration to initiate a request for certification of their eligibility from the appropriate tribe or BIA office. The other schools had students indicate their Indian eligibility at registration but did not require any official evidence of eligibility. For example, at one school students merely checked a box for "Indian" or "non-Indian." The school never required any official evidence of eligibility.

For our review, we requested colleges to furnish official evidence of Indian eligibility. The schools were able to furnish evidence for most students, but much of it was gathered after our visits. During its earlier student count audits, BIA was not consistent in advising the schools of the need for evidence of Indian eligibility. Some BIA teams stressed the importance of having this evidence, while others did not. The schools are now developing procedures to gather and maintain official evidence of students' Indian eligibility.

Enrollment data (note 2)

Maintenance of up-to-date enrollment information was another problem area. Some colleges were counting students who had dropped out of college, which resulted in overcounting. Other colleges were not determining full-time equivalent students on the basis of complete enrollment information, which resulted in under- and overcounting of Indian students.

In general we found that colleges counted courses that students had dropped before or had added after the 6-week cutoff date. In addition, some colleges neglected to count eligible credit-hours. These schools excluded credits for courses that students had dropped after or added before the 6-week cutoff. For example, at one school students were not required to submit "add" or "drop" forms until after the sixth week. If they wished to add or drop a course during the first 6 weeks, they called the registrar's office. Thus it was impossible to certify that all of the adds and drops had been processed; we had to assume that registration forms accurately reflected changes made during the first 6 weeks. During its earlier student count audits, BIA never emphasized the need for the

colleges to develop procedures to ensure timely enrollment information.

Counting errors (note 3)

We encountered a number of counting errors at the schools. For example, school officials counted

--students who were ineligible because they were attending high school or working on general educational development certificates,

--students taking classes for no credit,

--students attending classes with no definite starting or completion dates, and

--the maximum credits attainable for variable credit classes where students actually earned fewer credits.

NAVAJO COMMUNITY COLLEGE

The Navajo Community College is excluded from having to compute full-time equivalents by part F of the Higher Education Amendments of 1981. The school does not prepare a student count report or maintain all necessary records to compute a definitive student count. The college estimated that its fall 1980 student count was about 977. We verified the number of full-time equivalent students to be between 906 and 941, the difference relating to Indian eligibility. Since the college does not document evidence of Indian eligibility for its approximately 2,000 students, we were not able to verify that the students were Indians. Our count of 906 assumes that students who did not provide an Indian census number or tribal name are not Indians, while our count of 941 assumes that all students listed as Indians by the school are Indians.

CHAPTER 3

COLLEGE OFFICIALS' COMMENTS ON THE ACT AND BIA's IMPLEMENTATION

While college officials were unanimous in their support of the act's concept, they did raise issues concerning its implementation and funding. We discussed these opinions and problems with BIA officials in the Office of Indian Education Programs. BIA officials said that where BIA determines that problems exist, they will take action to correct them--if the act is reauthorized.

COLLEGE OFFICIALS SUPPORT THE ACT

College officials stated that the intent of the act is very good and that they want it to be permanently reauthorized. They stated that many Indians would not receive a college education if these funds were not available.

Two school presidents said that the act provided an incentive to attain independent school status. To be eligible for the act's funding, schools must be institutions of higher education. BIA has ruled that schools must be independent--not a satellite of a larger school--to meet the definition of an institution of higher education. Two schools in North Dakota had operated as satellite campuses of larger State universities before passage of the act. Presidents of these schools stated that they viewed the act and its funding as a vehicle to becoming independent. These schools severed their ties with the larger institutions and are now seeking accreditation as independent schools.

Independent status often means that schools lose some types of funding, which makes these schools more dependent on the act's funds. For example, Turtle Mountain lost $200,000 in Office of Education funding as a "developing institution" when it became independent. BIA will grant about 50 percent of this school's revenues during fiscal year 1981.

The chart below shows the act's fiscal year 1980 funding for each college and its relationship to the school's total funding.

College	Public Law 95-471 funding	Total funding (note a)	Percent of Public Law 95-471 funding to total funds
Navajo Community College	b/$6,400,000	$10,800,000	59
Nebraska Indian	$329,000	$ 580,000	57
Blackfeet	265,000	693,000	38
D-Q	242,000	646,000	38
Oglala Sioux	834,000	2,199,000	38
Turtle Mountain	341,000	957,000	33
Salish-Kootenai	287,000	911,000	31
Little Hoop	112,000	378,000	30
Sinte Gleska	552,000	2,028,000	27
Dull Knife	297,000	1,254,000	24
Standing Rock	354,000	1,813,000	24
College of Ganado	387,000	1,864,000	21
Total	$4,000,000	$13,323,000	
Total	$10,400,000	$24,123,000	43 Average

a/Includes all Federal and non-Federal funding reported in the school's annual reports.

b/The $6.4 million was based on need rather than full-time equivalent students. If the funding formula required in Title I had been applied, the college would only have received $2.5 million based on its full-time equivalent Indian students.

School presidents at two colleges expressed concern that with the current philosophy of less Federal funds, funding from sources other than the act would be cut back drastically. These officials said the schools will be increasingly more dependent on the act for their funds.

CONCERNS ABOUT BIA's IMPLEMENTATION OF THE ACT

College officials raised a number of concerns about the act's implementation by BIA. We brought these concerns to

BIA headquarters officials' attention and are in agreement with the actions they plan to take to resolve them.

Midyear adjustments

During fiscal year 1981 BIA initially funded 11 colleges. When two additional schools received positive feasibility study determinations after the start of the academic year, BIA approved fiscal year 1981 grants for these schools. To fund the two new schools, BIA in February 1981 adjusted the payments to the original 11 schools. For example, Standing Rock Community College's original grant was expected to be about $412,000. As a result of adding the two new schools, Standing Rock's grant was reduced by about $70,000. Two college presidents said that this type of adjustment hinders their fiscal stability and planning.

The Special Assistant to the Director, OIEP, said she agreed with this concern and, after reviewing BIA regulations, found that BIA had erred in funding the two new schools in 1981. BIA's implementing regulations state that any college which qualifies for a grant shall receive the grant for the academic year commencing after the date of the grant application's approval. Since the two grants have already been funded, BIA does not plan to rescind them. In the future BIA plans to follow its own regulations and provide new grants for the subsequent year. This solution will eliminate the midyear adjustment problem.

Certifying Indian eligibility

Students must be a member of a federally recognized Indian tribe and be eligible to receive services from the Secretary of the Interior for schools to receive funding under the act. Two school presidents want this requirement changed so that students who are not members of a federally recognized tribe can be counted for funds under the act. The Director, OIEP, said that he is drafting proposed changes to the act so that other Indian students from nonfederally recognized tribes can be counted for funding.

In addition, three school presidents complained of BIA delays in certifying Indian eligibility. The schools usually rely on BIA area offices to certify a student's Indian eligibility. However, this activity is given a low priority by some BIA offices, resulting in delays in processing requests for verification. Thus, some schools are unable to count eligible students for funding. The Director, OIEP, recognized this problem and has been discussing its resolution with the BIA Commissioner.

Simplifying and expanding the formula

Presidents at six schools want to simplify and/or expand the full-time equivalent formula. Generally, these officials

wanted to count credits for all courses in which students are enrolled, including summer courses. Currently, the formula does not consider any credit-hours over 12 for a full-time student. In addition, the formula excludes credits for summer terms.

The Director, OIEP, said that he recognized these problems and is drafting a change to the act so the formula would be changed to add all credit-hours and divide the sum by 12 to determine the full-time equivalent. This change would simplify the formula and make it compatible with other agency definitions of full-time equivalent.

Cutoff dates

The act established a 6-week cutoff date for the student count computation. Students who are enrolled at that point are counted in the full-time equivalent calculation, but those who withdraw from courses before that point are not eligible to be counted. Four school presidents said they wanted an earlier cutoff date because they felt the 6-week cutoff did not not adequately compensate the schools for their scheduling, planning, and administration costs. These officials propose that the cutoff date be set according to the schools' normal practices; that is, if a school restricts changes in student schedules to the first 2 to 3 weeks of the term, then the cutoff should be 3 weeks.

The Director, OIEP, said that he is drafting changes to the act and its regulations that would resolve part of this concern by changing the cutoff date to 3 weeks for schools on a quarter system. However, while revisions to the 6-week cutoff are being discussed, no change is currently being proposed for schools on the semester system; they would continue with a 6-week cutoff.

Other concerns

Presidents at four schools said they have yet to receive the maximum $4,000 per student as allowed by the act. Also, if the appropriations are relatively stable, then the prorated share for each school is reduced as the number of eligible schools increases.

Presidents at five schools said they wanted some of their other activities to be eligible for the act's funding. Currently, the act's funds are available to defray only the operating expenses of a college's education programs. College officials wanted to include some of their continuing education, adult education, workshops, and tribal development activities under the act's funding. For example, one school helped a tribe set up an accounting system, but this type of technical assistance is not eligible for the act's funding. Some school officials want to be able to use the act's funds for construction or renovation of their facilities, while other officials want to be able to include their non-Indian students in the student count computation.

Finally, presidents at two schools questioned the separate treatment of the Navajo Community College. They said that all schools should be treated equally. If the Navajo Community College is being funded according to operation and maintenance need, then all schools should be funded on need rather than by the existing full-time equivalent formula.

OIEP officials did not comment on the Navajo funding issues, because the act requires them to fund the college this way. The officials said they were opposed to expanding the use of education funds for noneducational purposes such as community services or facility construction. These officials said they did not think these activities are appropriate under the intent of the act.

LISTING OF COMMUNITY COLLEGE OFFICIALS INTERVIEWED

Blackfeet Community College:
- President
- Institutional Development Specialist
- Director of Student Finances
- Registrar

College of Ganado:
- President
- Chancellor
- Controller
- Director of Student Affairs
- Registrar
- Administrative Assistant to the President

D-Q University:
- President
- Vice President-Academic Affairs
- Chairman-Board of Trustees
- Controller
- Registrar

Dull Knife Memorial College:
- President
- Dean of Students
- Dean of Instruction
- Dean of Business Office
- Registrar

Little Hoop Community College
- President
- Dean

Sinte Gleska Community College:
- President
- Vice President-Admissions
- Acting Vice President-Finance
- Business Manager
- Registrar

Standing Rock Community College:
- President
- Vice President-Student Services
- Vice President-Instruction
- Comptroller
- Registrar

Navajo Community College:
- President
- Vice President-Academic and Student Affairs
- Dean of Students
- Special Assistant
- Registrar

Nebraska Indian Community College:
- President
- Dean-Winnebago Site
- Registrar
- Business Manager

Oglala Sioux Community College:
- President
- Vice President-Student Services and Administration
- Director of Institutional Development
- Business Manager
- Registrar

Salish-Kootenai Community College:
- President
- Vice President
- Director-Student Services
- Director-Physical Plant
- Controller

Turtle Mountain Community College:
- President
- Financial Aid Office
- Admissions Clerk

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